

November 27, 2019

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Reply Comments in Support of Joint Petition for Rulemaking on  
Distributed Transmission Systems, GN Docket No. 16-142**

Dear Ms. Dortch,

Graham Media Group, Inc. (“Graham”) supports the joint petition for rulemaking (“Joint Petition”) filed by America’s Public Television Stations and the National Association of Broadcasters proposing a revision to the FCC’s rules regarding Distributed Transmission Systems (“DTS”). We file these reply comments to urge the FCC to move forward with a Notice of Proposed Rulemaking on this issue, so that we and other broadcasters transitioning to Next Gen TV can use DTS to better distribute our ATSC 3.0 signals to viewers.

Graham is committed to bringing the benefits of ATSC 3.0 to our communities. Our market-leading Detroit station, WDIV-TV, is slated to transition to ATSC 3.0 by the end of 2020. The Joint Petition’s proposed changes to the DTS rule would enable broadcasters launching 3.0 streams to be able to serve the viewers in their markets.

For example, one of the many benefits of ATSC 3.0 is that it will support geo-targeted content, from news, to weather, to emergency alerts. Providing this targeted content will promote localism, the cornerstone of the Commission’s broadcast regulation. In order to be able to deploy this new technology to its fullest, broadcasters need to be able to reach all viewers in their contour over-the-air. Broadcasters who operate in more varied terrain than we do may have difficulty reaching the communities at the edges of their contour and may have to use translators or other means to broadcast their signal evenly across their community. It is precisely these viewers at the edges of a station’s contour, who may experience different weather events or emergency conditions from the center of a station’s community of license, who can most benefit from ATSC 3.0’s hyper-local programming. The Joint Petition’s proposed changes to the DTS rule would provide broadcasters with a more efficient way to reach these viewers and provide them the benefits of ATSC 3.0.

Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in cursive script, reading "Heidi I. Schmid Whiting". The signature is written in a dark ink and is positioned above the printed name and title.

Heidi I. Schmid Whiting  
Vice President & General Counsel